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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 Jerry Huggins, 13 Plaintiff, 14 v. 15 Nancy A. Berryhill, 16 Acting Commissioner of Social Security, 17 Defendant	4:17-cv-02566-KAW STIPULATION AND PROPOSED ORDER FOR FIRST EXTENSION OF TIME TO FILE REPLY
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19 The parties hereto, by and through their undersigned attorneys, hereby stipulate that Plaintiff,
20 Jerry Huggins, shall have an additional 30 days, until September 19, 2018, in which to file and serve a
21 reply in this action. This is the first stipulation for extended time requested by Plaintiff for the reply in
22 this matter. This is necessary due to an unexpected substitution of counsel made necessary by prior
23 extensions in this case as well as the time taken by the Appeals Council to decide whether or not to
24 agree to voluntary remand.

25 Specifically, Plaintiff's prior attorney (Joanna Parnes) reviewed the record, drafted the motion
26 for summary judgment, and intended to draft and file the reply prior to going on maternity leave on
27 August 1, 2018, but was unable to do so after Defendant's third extension. Accordingly, the

undersigned recently substituted in as counsel. Counsel for Defendant considered voluntary remand of this case, but the case was not suitable for remand. Counsel for Defendant notified Plaintiff's counsel regarding the decision regarding voluntary remand on August 15, 2018. In the interest of efficiency, the undersigned began reviewing the record and drafting the reply after she heard back from Counsel for Defendant regarding remand. For these reasons, and due to preexisting as well as additional unexpected and unavoidable workload demands, an extension is necessary for Plaintiff to sufficiently review the record and draft the reply.

Respectfully Submitted,

Dated: August 16, 2018

By: ____/s/____

Abby Herzberg

Attorney for Plaintiff

Dated: January 10, 2018

By: ____/s____ (as authorized via email on 8/16/28)

Tina Laxmi Naicker

Office of General Counsel

Social Security Administration

~~[PROPOSED]~~ ORDER:

PURSUANT TO THE STIPULATION, IT IS SO ORDERED

Dated: 8/17/18

By: Kandis Westmore

U.S. Magistrate Judge Kandis A. Westmore